

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CINDY J. LUI,

Civil Case No.: 2:21-cv-03042

Plaintiff,

v.

**FRONTLINE ASSET STRATEGIES,
LLC**

Defendant.

NOTICE OF REMOVAL OF CIVIL ACTION

PLEASE TAKE NOTICE that Defendant, Frontline Asset Strategies, LLC (“Frontline”) hereby removes to this Court the state court action described below.

1. On June 14, 2021 Plaintiff Cindy J. Lui (“Plaintiff”) filed an action in the Court of Common Pleas of Chester County, Pennsylvania, entitled and captioned: *Cindy J. Lui v. Frontline Asset Strategies, LLC* and assigned Case No. 2021-04272-MJ.

2. Plaintiff’s Complaint was served upon Frontline on or about June 18, 2021.

3. Plaintiff’s Complaint is attached hereto as Exhibit A.

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1331, and is one which may be removed to this Court by Frontline pursuant to the provisions of 28 U.S.C. §1441(b) in that it arises under the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.* As such, this court has Federal Question jurisdiction over this action pursuant to 28 U.S.C. §1331.

5. The Court of Common Pleas of Chester County, Pennsylvania, is located within the jurisdiction of the United States Court for the Eastern District of Pennsylvania. This court is the court embracing the location where the action is pending.

6. Under 28 U.S.C. § 1367, this Court has supplemental jurisdiction over any potential claims brought pursuant to any state, county, or local law that form part of the same controversy.

7. Here, jurisdiction is conferred on this Court, pursuant to 28 U.S.C. § 1367, concerning any claim that Plaintiff may assert in her complaint, which arises under the same facts and that form part of the same controversy.

8. This Notice of Removal is being filed within 30 days of the date upon which Frontline received a copy of the Plaintiff's Complaint pursuant to 28 U.S.C. §1446(b).

9. Concurrently, Frontline has provided written notice of this Petition for Removal to Plaintiff's counsel, filing a copy with the Court of Common Pleas of Chester County, Pennsylvania, as required by 28 U.S.C. §1446(d).

WHEREFORE, Frontline removes to this Court the above-entitled action, and requests that this action be placed on the docket of this Court for further proceedings as though this action had originally been instituted in this Court.

Dated: July 8, 2021

Respectfully submitted,

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Peter G. Siachos

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Notice of Removal of Civil Action** has been served upon the following known counsel of record this 8th day of July, via United States First-Class mail, postage prepaid:

Fred Davis, Esq.
2300 Computer Rd. – Ste G39
Willow Grove, PA 19090
(Counsel for Plaintiff)

/s/ Peter G. Siachos
Peter G. Siachos, Esq.